

ENTERED

July 30, 2024

Nathan Ochsner, Clerk

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

<hr/> In re: FREE SPEECH SYSTEMS LLC, <div style="text-align: center;">Debtor.</div> <hr/>	§ § § § § § §	Chapter 11 Case No. 22-60043
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**STIPULATION AND AGREED ORDER EXTENDING DEADLINE FOR TRUSTEE TO
RESPOND TO THE LAW OFFICE OF LIZ FREEMAN’S
FIRST AND FINAL FEE APPLICATION
(Relates to Doc. No. 972)**

WHEREAS, on July 29, 2022 (“*Petition Date*”), Free Speech Systems LLC (“*Debtor*”) filed its voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Texas (“*Court*”).

WHEREAS, on November 7, 2022, the Court entered an order approving the retention of Jackson Walker LLP (“*JW*”) [DE 265] as general bankruptcy counsel to Melissa Haselden, the Subchapter V Trustee (the “*Subchapter V Trustee*”), with Elizabeth Freeman acting as attorney-in-charge.

WHEREAS, in December 2022, Ms. Freeman left JW and formed the Law Office of Liz Freeman, PLLC (“*Freeman*”) and worked as co-general counsel with JW to the Subchapter V Trustee, with Ms. Freeman working as attorney-in-charge.

WHEREAS, on January 19, 2024, an application was filed to employ Freeman as counsel for the Subchapter V Trustee, effective as of December 5, 2022 [DE 789].

WHEREAS, on June 21, 2024, the Court entered an *Order Dismissing Case* [DE 956] (“*Dismissal Order*”) which, among other matters, (i) dismissed the Debtor’s bankruptcy case, (ii) directed all final applications for compensation be filed within 14 days after the entry of the

Dismissal Order, and (iii) directed the CRO of the Debtor to transfer control of the Debtor's accounts to Christopher R. Murray, in his capacity as the Chapter 7 Trustee ("**Trustee**") for the bankruptcy estate of Alexander Jones (Case No. 22-33553).

WHEREAS, Freeman filed its *First and Final Fee Application* [DE 972] on July 5, 2024 (the "**Final Fee Application**") requesting allowance and payment, on a final basis, professional fees and reimbursable expenses for professional services rendered as counsel to the Subchapter V Trustee for the period of December 5, 2022 through June 14, 2024.

WHEREAS, the deadline for all parties receiving service via ECF to file a response to the Final Fee Application is July 26, 2024 ("**Original Response Deadline**").

WHEREAS, the Trustee requested, and Freeman has agreed to, a 14-day extension of the Original Response Deadline of the Trustee in order to aid in a more efficient transition of the Alex Jones bankruptcy case after the Court converted it from chapter 11 to chapter 7 on June 14, 2024.

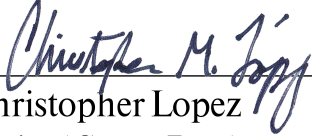
NOW, THEREFORE, IT IS STIPULATED AND AGREED BY THE PARTIES HERETO AND UPON APPROVAL BY THE COURT OF THIS STIPULATION, IT IS SO ORDERED THAT:

1. The above recitals are incorporated by reference herein with the same force and effect as if fully set forth hereafter.
2. The deadline for the Trustee to file a response and/or objection to Freeman's Final Fee Application is extended to **August 9, 2024**.
3. Nothing herein shall be construed to prohibit the Parties from seeking further extensions by agreement and/or by further order of the Court.
4. Notwithstanding anything in the Bankruptcy Code or the Bankruptcy Rules to the contrary, this *Stipulation and Agreed Order* shall be effective immediately upon the Court's approval.

5. The Court has exclusive jurisdiction and power regarding the implementation, interpretation, and enforcement of this *Stipulation and Agreed Order*.

IT IS SO ORDERED.

Signed: July 29, 2024



Christopher Lopez
United States Bankruptcy Judge

Agreed as to form and substance:

Porter Hedges LLP By: <u>/s/ Joshua W. Wolfshohl</u> Joshua W. Wolfshohl State Bar No. 24038592 1000 Main Street, 36 th Floor Houston, Texas 77002 (713) 226-6000 (713) 228-1331 (fax) Proposed Counsel to Christopher R. Murray, Chapter 7 Trustee of the Alex Jones Estate	The Law Office of Liz Freeman, PLLC By: <u>/s/ Elizabeth Freeman</u> Elizabeth Freeman State Bar No. 24009222 PO Box 61209 Houston, Texas 77208-1209 832-779-3580 Proposed Counsel to Melissa Haselden, Former Subchapter V Trustee for Free Speech Systems, LLC
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was duly served by electronic transmission to all registered ECF users appearing in the case on July 26, 2024.

/s/ Joshua W. Wolfshohl

Joshua W. Wolfshohl